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RICHARD W. NAGEL, CLERK OF COURT
COLUMBUS, OHIO

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION

MARK ALLEN McCONNAUGHY
(Enter Above the Name of the Plaintiff in this Action)

vs.

BROOKE PERRY
(Enter above the name of the Defendant in this Action)

If there are additional Defendants, please list them:

JESSICA LAGNEAUX

MICHEAL MOORE

KALEIGH MARTIN

KATHY SEABRIGHT

2 2 1 CV 1 7 6. 1

Judge Watson
MAGISTRATE JUDGE JOLSON

COMPLAINT

I. Parties to the action:

Plaintiff: Place your name and address on the lines below. The address you give must be the address where the court may contact you and mail documents to you. A telephone number is required.

MARK ALLEN McCONNAUGHY
Name - Full Name Please - PRINT

3546 MONROE ST. APT. #3
Street Address

BELLAIRE, OHIO 43906
City, State and Zip Code

1-740-325-1154
Telephone Number

If there are additional Plaintiffs in this suit, a separate piece of paper should be attached immediately behind this page with their full names, addresses and telephone numbers. If there are no other Plaintiffs, continue with this form.

Defendant(s):

Place the name and address of each Defendant you listed in the caption on the first page of this Complaint. This form is invalid unless each Defendant appears with full address for proper service.

1. BROOKE PERRY
Name - Full Name Please
710 WHEELING AVE. CAMBRIDGE, OHIO 43725
Address: Street, City, State and Zip Code
2. JESSICA LAGNEAUX
710 WHEELING AVE. CAMBRIDGE, OHIO 43725
3. MICHAEL MOORE
710 WHEELING AVE. CAMBRIDGE, OHIO 43725
4. KALEIGH MARTIN
710 WHEELING AVE. CAMBRIDGE, OHIO 43725
5. KATHY SEABRIGHT
1406 CADIZ RD. WINTERSVILLE, OHIO 43953
6. _____

If there are additional Defendants, please list their names and addresses on a separate sheet of paper.

II. Subject Matter Jurisdiction

Check the box or boxes that describes your lawsuit:

- ☒ Title 28 U.S.C. § 1343(3)
[A civil rights lawsuit alleging that Defendant(s) acting under color of State law, deprived you of a right secured by federal law or the Constitution.]
- ☐ Title 28 U.S.C. § 1331
[A lawsuit "arising under the Constitution, laws, or treaties of the United States."]
- ☐ Title 28 U.S.C. § 1332(a)(1)
[A lawsuit between citizens of different states where the matter in controversy exceeds \$75,000.]
- ☐ Title _____ United States Code, Section _____
[Other federal status giving the court subject matter jurisdiction.]

III. Statement of Claim

Please write as briefly as possible the facts of your case. Describe how each Defendant is involved. Include the name of all persons involved, give dates and places.

Number each claim separately. Use as much space as you need. You are not limited to the papers we give you. Attach extra sheets that deal with your statement claim immediately behind this piece of paper.

UPON MY ELIGABILITY FOR THE OHIO HEALTH CARE WAIVER PROGRAM ON NOVEMBER 19TH, 2019 UNTO THIS DAY AND INTO THE FUTURE... I HAVE RECEIVED 52 DAYS OF PROPER ASSISTANCE ONLY! THIS FACT AMOUNTS TO BUT 10% OF MY ELIGABILITY HAS BEEN SATISFIED IN ACCORDANCE WITH MY HUMAN AND CONSTITUTIONAL RIGHTS! BROOKE PERRY WAS THE DIRECTOR OF SAID PROGRAM!!! ACTING UNDER THE COLOR OF STATE LAW, SHE UNJUSTLY DENIED ME WELFARE BENEFITS FROM DATE OF APPLICATION UNTO APRIL 7TH, 2020. THIS AMOUNTS TO 137 DAYS AND WHEN ASKED ABOUT THIS FACT AT A OHIO STATE HEARING WITHIN THE BELMONT COUNTY OHIO DEPARTMENT OF JOB AND FAMILY SERVICES... SHE STATED "BECAUSE SHE COULD NOT CONTACT ME"!!! FROM JULY 26TH 2020 UNTO HER STEPPING DOWN AT HER POSITION, SHE FAILED INTENTIONALLY TO RESPECT MY HUMAN RIGHTS AND CONSTITUTIONAL RIGHTS DUE TO PERSONAL ANIMOSITY TOWARDS ME EVEN ENCOURAGING HER SUBORDINATES TO COPY AND ACT UPON HER BEHAVIOR TOWARDS ME! HER CHOICES HAS CAUSED MANY SEVERE HARDSHIPS IN MY LIFE, A DETERIORATION OF MY MENTAL AND PHYSICAL WELLBEING AND EVEN PLACED MY LIFE IN DANGER OF ENDING!!!

IV. Previous lawsuits:

If you have been a Plaintiff in a lawsuit, for each lawsuit state the case number and caption.
(Example, Case Number: 2:08-cv-728 and Caption: John Smith vs. Jane Doe).

Case NumberCaption

_____	_____	vs. _____
_____	_____	vs. _____
_____	_____	vs. _____

V. Relief

In this section please state (write) briefly exactly what you want the court to do for you. Make no legal argument, cite no case or statutes.

I WISH FOR BROOKE PERRY BE MADE TO
COMPENSATE ME IN THE AMOUNT OF \$50,000.00
I WISH FOR JESSICA LAGNEAUX BE MADE TO
COMPENSATE ME IN THE AMOUNT OF \$10,000.00
I WISH FOR MICHEAL MOORE BE MADE TO
COMPENSATE ME IN THE AMOUNT OF \$15,000.00
I WISH FOR KALEIGH MARTIN BE MADE TO
COMPENSATE ME IN THE AMOUNT OF \$5,000.00
I WISH FOR KATHY SEABRIGHT BE MADE TO
COMPENSATE ME IN THE AMOUNT OF \$20,000.00

I state under penalty of perjury that the foregoing is true and correct. Executed on

this 4TH day of APRIL, 2021.



Signature of Plaintiff